

Morton C. Batt  
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June 06, 2006

Honorable Nancy Gertner  
United States District Court  
District of Massachusetts  
1 Court House Way  
Boston MA 02210

RE: Desmond v. CitiStreet, et al.  
Docket No.: 05-cv-10355 NG  
ORDER OF JULY 13,2005 BARRING DEDUCTIONS  
OR WITHDRAWALS FROM  
STANDARD AUTOMOTIVE 401 (k) PLAN

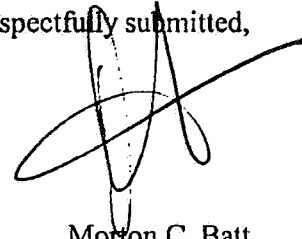
Dear Judge Gertner:

It is respectfully requested that the Court modify the captioned Order to permit the deduction of \$413.00 from assets of the SAC 401 (k) Plan ("the Plan") needed to fund payment of the three year premium for the "ERISA" bond covering the plan. Attached hereto please find a copy of ; (a) transmittal letter from Bieber Insurance and, (b) Bieber Invoice # 6603.

The deduction of this \$463.00 from plan assets now being requested is in addition to the \$750.00 deduction , plus use of \$3,750.00 remaining in the Trustee's SAC account, needed for audit fees as requested in my letter of May 01, 2006.

Upon approval from the Court for use of plan assets to pay both the audit fees and three year bond premium I ask that such deductions be permitted against the unearned retainer monies now being held by the White and Williams law firm. White and Williams is holding the unearned retainer by agreement of the parties-in-interest.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Morton C. Batt', written over the text 'Respectfully submitted,'.

Morton C. Batt

cc:

Henry C. Dinger, Esq.  
Ronald M. Jacobs, Esq.  
Michael O. Kassak, Esq.  
Michael F. Kraemer, Esq.  
Anthony L. Scialabba, Esq.  
Thomas P. Smith, Esq.  
Jennifer Weekley, Esq.

**Joseph Aimi**  
**Kenneth Bieber Insurance Inc.**  
**220 East 42nd Street Suite 2202**  
**New York, NY 10017**  
**Phone: (212)983-3700 Fax: (212)867-6024**

May 19, 2006

Standard Automotive Corp.  
c/o Morton Batt  
2424 NW 63<sup>rd</sup> Street  
Boca Raton, FL 33496

We were told that you now handle this account by Scialabba & Associates. Please note that my staff is available to help with any questions you may have.

Please be confident that we will give you prompt, quality, personal service to your account.

Please review attached bond renewal certificate carefully. In the event of a loss, your rights to insurance coverage will be controlled by the terms, conditions and exclusions as set forth in this policy. If you have any questions or there are any discrepancies, please call our office.

**INSURANCE COMPANY: Travelers Insurance**  
**POLICY#: 104151660**  
**POLICY : ERISA BOND 401K**  
**PREMIUM: \$413.00 (3 Year Premium)**

OUR INVOICE IS ATTACHED



SERVING THE CUSTOMER SINCE 1962



April 28, 2006

Kelly E Gubanich  
 770 Pennsylvania Drive  
 Suite 110  
 EXTON, PA 19341  
 Phone:(610) 458-2203  
 Fax:(866) 785-2463  
 Email:KGUBANIC@stpaultravelers.com

BIEBERKENNETTINC (007012)  
 220 EAST 42ND ST STE 2202  
 NEW YORK, NY 10017

This is an Agency Billed Policy.

This is the Renewal for

STANDARD AUTOMOTIVE CORPORATION EMPLOYEE CONTRIBUTION  
 PLAN  
 1002 LINCOLN DRIVE, WEST, STE B  
 MARLTON, NJ 08053

Product Type: ERISA SAA  
 Policy Number: 104151654  
 Total Policy Premium: \$279.00

Policy Period: August 6, 2003 to Until Cancelled  
 Billing Period: August 6, 2006 to August 6, 2009  
 Trans Effective Date: August 6, 2006  
 Commission-Percentage: 20%  
 Special Commission: \$0.00

Countersignature Commission: \$0.00  
 Countersignature Rate: 0%

<u>Coverage</u>	<u>Liability</u>	<u>Deductible</u>	<u>Year 1</u>	Premium Years <u>Year 2</u>	<u>Year 3</u>
A-Bkt	\$100,000	\$0	\$279.00	Included	Included

Surcharge:	\$0.00	\$0.00	\$0.00
Tax:	\$0.00	\$0.00	\$0.00
Combined Premium:	\$279.00	\$0.00	\$0.00

## Comments:

Thank you for placing your business with us.